

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 05-10079-RCL
)
 MARCOS RODRIGUEZ SANTOS)

JOINT MOTION TO EXCLUDE TIME FROM 3/24/05 UNTIL 4/26/05 AND TO
TRANSFER CASE TO DISTRICT COURT

The United States of America, by and through its attorneys,
Michael J. Sullivan, U.S. Attorney for the District of
Massachusetts, and Nadine Pellegrini, Assistant U.S. Attorney,
and John Palmer, counsel for the Defendant, hereby move this
court to exclude the following period of time:

(1) The parties appeared before the court for the initial appearance on this matter on 3/25/05. The government moved for detention and the matter was continued and resolved on 3/29/05. This period is excludable pursuant to 18 U.S.C. §3161(h)(1)(F).

(2) Automatic discovery was requested and, pursuant to the time limits imposed by the Local Rules, twenty-eight days for discovery is excludable. The parties request that the time from 3/29/05 until 4/26/05 be excluded.

(3) The parties have prepared and filed a Final Status Conference report with the court. The parties request that this matter be transferred to the District Court for disposition.

Respectfully submitted,

For the Defendant:
MARCOS SANTOS

MICHAEL J. SULLIVAN
United States Attorney

/s/John Palmer
JOHN PALMER, ESQ.
24 School Street
Boston, MA 02108

By: /s/Nadine Pellegrini
NADINE PELLEGRINI
Assistant U.S. Attorney

Dated: June 23, 2005